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**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

Order Instituting Rulemaking to Continue
Implementation and Administration, and
Consider Further Development of, California
Renewables Portfolio Standard Program

Rulemaking 15-02-020
(Filed February 26, 2015)

**COMMENTS OF THE LARGE-SCALE SOLAR ASSOCIATION ON RPS PLANS
RULING QUESTIONS ON PROJECT VIABILITY**

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June 3, 2016

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Pursuant the Commission’s Rules of Practice and Procedure, and the Assigned Commissioner Peterman and Administrative Law Judge Mason’s May 17th Ruling Identifying Issues and Schedule for Review of 2016 Renewables Portfolio Standard Procurement Plans (the “Ruling”) the Large-scale Solar Association, (“LSA”) respectfully submits the comments below on project viability.

The Ruling asks parties to respond to whether the Commission’s Project Viability Calculator (“PVC”) is needed to meet the requirements of Public Utilities Code Section 399.13(a)(4)(A)(iii) in light of more stringent bidding requirements which may meet these requirements without the use of the PVC. LSA is generally supportive of efforts to streamline program requirements and appreciates the Commission’s inquiry on this subject.

In order to fully address the Commission’s questions as to whether a Phase II transmission interconnection study and a land use entitlement “application deemed complete” can meet the statutory requirements it is important for parties to have an overall understanding of whether the PVC remains useful and what impact the newer bidding requirements have had on the kinds of bids received in the RFO process. Given the limited solicitations to date under the

revised bidding requirements it may be too early to fully understand and assess the implications of these changes. LSA looks to the utilities to opine on the effectiveness in practice of the overall requirements to date to better inform responses to these questions.

LSA finds, however, that as a whole on paper the existing requirements are more than sufficient to address project viability as required by the statute. We have commented previously that the increased stringency with both Phase II interconnection requirements and “application deemed complete” may overly restrict the Commission’s pool of projects bid into RFOs particularly given challenges in aligning the timing of these hurdles and the RFO schedules. We encourage the Commission to continue to be mindful of the risks of overly strict bidding requirements.

Standing alone the “application deemed complete” and Phase II interconnection requirements are highly relevant to criteria 3, the risk that the facility will not be built but also may be indicators of criteria 1, the developers experience. They do not however provide specific insight into whether a developer has previously successfully developed, financed or operated a project, an important element of the existing PVC. This information continues to be relevant to meeting the requirements of criteria 1 and assessing overall project viability. In addition, the bidding requirements do not address criteria 2, feasibility of the technology. Based on these limitations, LSA recommends the Commission review how the bidding requirements and the PVC are working in practice and then consider revising the PVC to streamline the development milestone section to reflect the current bidding requirements.

Conclusion

LSA appreciates the opportunity to provide comments on the issues of project viability and the use of the PVC.

Dated: June 3, 2016

Respectfully Submitted,

/s/ Rachel Gold
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VERIFICATION

I, Rachel Gold, am the Policy Director of the Large-scale Solar Association. I am authorized to make this Verification on its behalf. I declare that the statements in the foregoing copy of the *Comments Of The Large-Scale Solar Association On RPS Plans Ruling Questions On Project Viability* are true of my own knowledge, except as to the matters, which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 3, 2016 at Berkeley, California.

/s/ Rachel Gold

Rachel Gold
Policy Director
Large-scale Solar Association